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15 ROBERT HUNTER BIDEN

16 **UNITED STATES DISTRICT COURT**

17 **CENTRAL DISTRICT OF CALIFORNIA**

18 **WESTERN DIVISION**

19 ROBERT HUNTER BIDEN, an  
individual,

20 Plaintiff,

21 vs.

22 PATRICK M. BYRNE, an individual,

23 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**PLAINTIFF ROBERT HUNTER  
BIDEN'S REQUEST FOR  
COUNSEL TO APPEAR  
REMOTELY FOR JANUARY 27,  
2025 STATUS CONFERENCE;  
DECLARATION OF ABBE D.  
LOWELL**

[*Proposed*] Order filed and served  
concurrently herewith]

Date: January 27, 2025

Time: 3:00 p.m.

Ctrm.: 10A

Judge: Hon. Stephen V. Wilson

5800299.2

**PLAINTIFF ROBERT HUNTER BIDEN'S REQUEST FOR COUNSEL TO APPEAR REMOTELY FOR  
JANUARY 27, 2025 STATUS CONFERENCE; DECLARATION OF ABBE D. LOWELL**

1                   **TO THE HONORABLE COURT, ALL PARTIES AND THEIR**  
2 **ATTORNEYS OF RECORD:**

3                   Plaintiff Robert Hunter Biden (“Plaintiff”) hereby respectfully requests  
4 permission from this Court for his Counsel, Abbe D. Lowell, to appear remotely by  
5 way of videoconference (e.g. Zoom) for the Status Conference scheduled in this case  
6 for January 27, 2025 at 3:00 p.m. Plaintiff understands the Court’s standing order  
7 requires a request to appear remotely for a proceeding to be filed seven (7) days prior  
8 to the hearing, but here, because the Status Conference was scheduled for less than  
9 seven (7) days from the Court’s Minute Order scheduling that conference (Dkt. No.  
10 178), Plaintiff filed this request as soon as possible and respectfully requests the Court  
11 grants this request.

12                  Good cause exists to grant this request because Mr. Lowell has been involved  
13 in the disposition of the current discovery dispute that formed the basis of Plaintiff’s  
14 January 14, 2025 *Ex Parte* Application, Mr. Lowell was the person who took  
15 Defendant’s first deposition, and he has also been the direct subject of some of  
16 Defendant’s recent allegations and his participation in the status conference is,  
17 therefore, necessary. (See Declaration of Abbe D. Lowell, at ¶2.) Mr. Lowell is  
18 unable to be in the State of California on January 27, 2025, due to prior commitments  
19 (he teaches a large class at Georgetown Law Center in Washington, D.C. on  
20 Mondays), but Mr. Lowell’s co-counsel, Bryan M. Sullivan, will be appearing in  
21 person for the Status Conference, so Plaintiff will have another attorney present for  
22 this hearing. (See Declaration of Abbe D. Lowell, at ¶3.)

23                  ///  
24                  ///  
25                  ///  
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27                  ///  
28                  ///

1 Accordingly, Plaintiff respectfully requests that the Court grant this request for  
2 Mr. Lowell to appear remotely by videoconference at the January 27, 2025 Status  
3 Conference in this matter.

4

5 Dated: January 23, 2025

EARLY SULLIVAN WRIGHT  
GIZER & MCRAE LLP

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7 By: /s/ Zachary C. Hansen

8

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38  
39 *Attorney for Plaintiff*  
40 *Robert Hunter Biden*

# DECLARATION OF ABBE D. LOWELL

I, Abbe D. Lowell, declare and state as follows:

1. I am counsel of record for Plaintiff Robert Hunter Biden (“Plaintiff”) in the above-entitled action and am over the age of 18. I hereby submit this declaration in support of Plaintiff’s Request for Counsel to Appear Remotely for January 27, 2025 Status Conference. If called as a witness, I would and could testify to the matters contained herein.

8        2. I have involved in the disposition of the current discovery dispute that  
9 formed the basis of Plaintiff's January 14, 2025 *Ex Parte* Application, I was the  
10 person who took Defendant's first deposition, and I have also been the direct subject  
11 of some of Defendant's recent allegations and my participation in the status  
12 conference is, therefore, necessary.

13       3. I am unable to be in the State of California on January 27, 2025, due to  
14 prior commitments (I teach a large class at Georgetown Law Center in Washington,  
15 D.C. on Mondays), but my co-counsel, Bryan M. Sullivan, will be appearing in person  
16 for the Status Conference, so Plaintiff will have another attorney present for this  
17 hearing.

18 I declare under penalty of perjury under the laws of the United States of  
19 America that the foregoing is true and correct. Executed on this 23rd day of January,  
20 2025, at Washington, D.C.

/s/ *Abbe D. Lowell*

Abbe D. Lowell